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Attorneys for Plaintiff Lisa S. Black

**IN THE UNITED STATES DISTRICT COURT
FOR THE
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS**

LISA S. BLACK,)	CIVIL ACTION NO. 05-0038
)	
Plaintiff,)	
)	
vs.)	
)	
JIM BREWER, individually and in his)	NOTICE OF MOTION
official capacity as Acting Principal for)	AND MOTION TO COMPEL
Hopwood Junior High School,)	
COMMONWEALTH OF THE NORTHERN)	Date : August 10, 2006
MARIANA ISLANDS PUBLIC SCHOOL)	Time: 9:00 a.m.
SYSTEM, and JOHN AND/OR JANE DOE,)	Judge: Alex Munson
)	
Defendants.)	

Please take NOTICE that on August 10, 2006 at 9:00 a.m. or as soon as thereafter as Plaintiff may be heard, Plaintiff, Lisa Black, by and through counsel, will move and hereby does move this honorable Court for an Order Compelling Defendant Commonwealth of the Northern Mariana Islands Public School System to respond to Plaintiff's Second Set of Requests for Production.

This Motion is made pursuant to Fed.R.Civ.P., Rule 37(a)(4) and LR 16.2C5(d)(1). This Motion is supported by a memorandum, a declaration of counsel, and a proposed order. The

1 basis of this Motion, as in more fully set out in the brief, is that Defendant has produced almost
2 2,000 pages of documents that Defendant claims support its various factual and legal
3 contentions but Defendant has refused to identify what specific documents support which of its
4 many different contentions. Following Ninth Circuit precedent, this is improper.
5

6 Dated : July 11, 2006

Respectfully submitted,

7 O'CONNOR BERMAN DOTTS & BANES
8 Attorneys for Plaintiff Lisa Black
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10 By: _____/s/_____
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